

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

**HENRY BOYD, JR.; DOROTHY
BISHOP; and KAREEM EL-AMEEN,
individually and on behalf of all others
similarly situated**

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:06cv548HTW-LRA

**HALEY BARBOUR, GOVERNOR OF THE STATE
OF MISSISSIPPI; JIM HOOD, ATTORNEY
GENERAL OF THE STATE OF MISSISSIPPI;
and ERIC CLARK, SECRETARY OF STATE OF
MISSISSIPPI, members of the Mississippi State Board of
Election Commissioners; LUCY CARPENTER, Circuit
Clerk and Registrar for Marshall County, Mississippi;
ANGIE MCGINNIS, Circuit Clerk and Registrar for
Oktober County, Mississippi; ROGER GRAVES,
Circuit Clerk and Registrar for Pike County, Mississippi,
on behalf of himself and all others similarly situated; and
AUDREY JENKINS, ARTIST ROBBINS, SHIRLEY
FITZGERALD, MELODY WHITE, and LYNN WELLS,
members of the PIKE COUNTY, MISSISSIPPI BOARD
OF ELECTION COMMISSIONERS, on behalf of
themselves and all others similarly situated**

DEFENDANTS

**RESPONSE TO LOCAL DEFENDANTS'
MOTION TO DISMISS COMPLAINT**

Plaintiffs, Henry Boyd, Jr., Dorothy Bishop, and Kareem El-Ameen, individually and on behalf of all others similarly situated, adopt their Response to Defendants' Motion to Dismiss filed in this case on October 30, 2006. And, plaintiffs also point out that the Local defendants' motion to dismiss is moot at this point because the Court has already denied the State defendants' motion to dismiss.

WHEREFORE, PREMISES CONSIDERED, plaintiffs respectfully request the Court to deny the Local defendants' motion to dismiss as well.

This the 2nd day of November, 2006.

Respectfully submitted,
HENRY KIRKSEY, ET. AL.,
PLAINTIFFS

/s/ Carroll Rhodes
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CERTIFICATE OF SERVICE

I, CARROLL RHODES, one of the attorneys for the plaintiffs, hereby certify that I have this day electronically served by the ECF system, which sent notification of such filing of a true and correct copy of the above and foregoing to:

Shawn Shurden, Esq.
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Wayne Dowdy, Esq.

And, I have today mailed, a true and correct copy of the foregoing to:

Wayne Dowdy, Esq.
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This the 2nd day of November, 2006.

/s/ Carroll Rhodes
Carroll Rhodes